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IN CLERK'S OFFICE
U.S. DISTRICT COURT
★ **MAR 02 2012**

BROOKLYN OFFICE

LANCE LAZZARO
RANDALL LAZZARO *

JAMES KILDUFF *
JAMES KIRSHNER
ROGER GREENBERG

* ADMITTED IN NY & NJ

March 1, 2012

Honorable Sandra L. Townes
United States District Court
Judge Eastern District of New
York 225 Cadman Plaza East
Brooklyn, NY 11201

The application is ~~granted.~~
SO ORDERED. denied.

s/ SLT

Re: United States v. Gerald Parsons

Sandra L. Townes, U.S.D.J.

Dated: March 2, 2012
Brooklyn, New York

Criminal Docket No.: 11 CR 413

Dear Judge Townes:

Please be advised that I am writing this letter on behalf of Gerald Parsons. I am writing to request your Honor's permission to allow Mr. Parson's pre-trial conditions of release, namely restricting his movements to New York, New Jersey and Pennsylvania, be modified to permit Mr. Parsons to travel with his girlfriend to Maryland for the purpose of obtaining Kitchen equipment that was won in an online auction (please see attached bid information).

With the Court's permission Mr. Parsons and his girlfriend would leave the family's home on Wednesday, March 8th at approximately 5:00 pm and travel via car to Millersville, Maryland. Mr. Parsons and his girlfriend would stay at a hotel Wednesday night and leave Thursday morning, picking up the equipment from Anne Arundel County Schools Operating Warehouse located at 8307 Grover Road, Millersville MD. The travel time would be approximately four hours from the warehouse to Mr. Parson's home.

Therefore, I request that your Honor permit Mr. Parsons to travel to Maryland for this short stay on the night of March 7th 2012 and return to his home on March 8th 2012. The government, by AUSA Lan Ngyuen, and pre-trial services, by Officer Robert Long, do not oppose this application.

Agreed to by:

Very truly yours,

LAZZARO LAW FIRM, P.C.

BY:

/s/

Lance Lazzaro

English

Public | Surplus.

Auction #681751 - Beverage Air Refrigerator

Final Price \$331.00 Time Left Closed Auction Extended High Bidder jerryfd276 # of Bids 17 First Offer \$50.00 Auction Started Feb 17, 2012 7:41:27 PM EST Auction Ended Feb 24, 2012 2:08:41 PM EST Seller Anne Arundel County Public Schools AACPS [View seller's auctions] Terms and Cond. [View Terms and Conditions] Pick-up Location Anne Arundel County Schools Operating Warehouse [Map It] 8307 Grover Rd Millersville, MD 21108 Auction Contact James Williams (410) 923-5030 [Send Email] Payment Visa, MasterCard, Discover Online CC Payment Shipping Buyer must pickup item(s)	Remove from Watch List Share
	Bid History [View bid history] Questions 0 Questions [View Questions] Pay Online [Review Receipt] PAID

Description Beverage Air Piedmont Line Refrigerator. Great for restaurants, cafeteria kitchens, schools, churches, camp grounds, garages, etc. Great offer, see photos. Condition: GOOD Note: Click on pictures below to view larger image	Public Surplus handles all payments for Anne Arundel County Public Schools. Payment for awarded item must be received within five (5) business days of the close of the auction. The state of Maryland sale tax of 6.0% will be applied to all sales. The buyer shall add and include the sale tax amount when making payment. Buyers Premium: A 9.5% buyer Premium will be added to the final sales price with a \$1 minimum charge per auction to collect payment. All property being offered is "AS IS, WHERE IS". AACPS makes no warranty, guaranty or representation of any kind, expressed or implied, as to the merchantability or fitness for any purpose of the property offered. The Receiver is not entitled to
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